

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

In re:

James A. Campion
and
Michelle E. Campion
Debtor(s).

Case No.: 9:14-bk-14272-FMD
Chapter 13

**DEBTORS' MOTION FOR RECONSIDERATION OF ORDER DISMISSING
CHAPTER 13 CASE AND FOR ATTORNEY'S FEES AND EXPENSES**

COME NOW, James A. Campion and Michelle E. Campion (the "Debtors") by and through the undersigned counsel and hereby file this Motion for Reconsideration of Order Dismissing Chapter 13 Case. As grounds therefore Debtors allege:

1. The Debtors filed a petition for relief under Chapter 13 of the Bankruptcy Code on December 8, 2014.
2. The Debtors next Confirmation Hearing is Scheduled for May 21, 2015.
3. The Debtors fell behind on their monthly payments pursuant to the confirmed Chapter 13 Plan and the Trustee has filed a Motion to Dismiss for Failure to Make Plan Payments to Trustee (Doc. No. 21).
4. On March 13, 2015, the Court issued an Order Dismissing Confirmed Chapter 13 Case (Doc. No. 33).
5. The Debtors recently changed residences which caused them to suffer from unexpected moving expenses. The Debtors no longer anticipate these expenses, and reasonably believe that they can catch up with the outstanding balance of their Chapter 13 Plan by the end of May 2015.
6. The Debtors are gainfully employed and believe that they can successfully complete their Chapter 13 bankruptcy. The Debtors are requesting the Court to reinstate the instant Chapter

13 case.

7. The Debtors' attorney asks to be awarded attorney's fees as an administrative expense as a result of filing this motion in the amount of \$300.00 if no hearing is set on this Motion or \$400.00 if the hearing is required. The additional costs and expenses associated with service and mailing of this Motion, Notice of Hearing and Order are expected to be \$249.00.

WHEREFORE, Debtors respectfully request that the Court enter an order:

(a) granting Debtors' Motion for Reconsideration of Order Dismissing Chapter 13 Case and for Attorney's Fees and Expenses; (b) reinstating the instant Chapter 13 case; (c) granting such other and further relief as the Court deems appropriate.

Respectfully Submitted on March 26, 2015

MARTIN LAW FIRM, P.L.,
By /s/ Eviana J. Martin
Eviana J. Martin
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Attorneys for the Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 26, 2015, a true and correct copy of the foregoing Debtors' Motion for Reconsideration of Order Dismissing Chapter 13 Case and for Attorney's Fees have been furnished **electronically** to:

U.S. Trustee, 501 East Polk Street, Suite 1200, Tampa, FL 33602;
Jon Waage, Chapter 13 Trustee, P.O. Box 25001, Bradenton, FL 34206;

Via regular First Class U.S. Mail to:

James and Michelle Champion, PO Box 150245; and all the creditors on the attached mailing matrix.

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Attorneys for the Debtors

Label Matrix for local noticing
113A-9
Case 9:14-bk-14272-FMD
Middle District of Florida
Ft. Myers
Wed Mar 25 12:47:15 EDT 2015

PHH Mortgage Corporation
c/o Steven G. Powrozek
Shapiro, Fishman & Gache, LLP
4630 Woodland Corporate Blvd.
Suite 100
Tampa, FL 33614-2429

World Omni
Tripp Scott P.A.
James B Flanigan, Esq
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Southgate, MI 48195-0968

American Express
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(p)AMERICAN HONDA FINANCE
P O BOX 168088
IRVING TX 75016-8088

Bank of America
4060 Ogletown
Newark, DE 19713

(p)LEE MEMORIAL HEALTH SYSTEM
ATTN ANGELA TAYLOR
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CAPE CORAL FL 33991-2038

Capital One, N.A.
c o Becket and Lee LLP
POB 3001
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Cavalry SPV I, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-1340

JH Portfolio Debt Equities LLC c/o JD Receiv
P O Box 382656
Germantown, TN 38183-2656

TD Auto Finance LLC
1000 Ridgeway Loop Rd, Suite 200
Memphis, TN 38120-4036

Amca
2269 S Saw Mill
Elmsford, NY 10523-3832

American Eagle GECRB
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076-9104

American Express
Po Box 3001
16 General Warren Blvd
Malvern, PA 19355-1245

American InfoSource LP as agent for
Midland Funding LLC
PO Box 268941
Oklahoma City, OK 73126-8941

(p)BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

Capital One
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Capital One Bank (USA) N.A.
Po Box 30285
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C/O Ella Roberts
4630 Woodland Corporate Boulevard
Suite 100
Tampa, FL 33614-2429
United States Trustee - FTM7/13 7
Timberlake Annex, Suite 1200
501 E Polk Street
Tampa, FL 33602-3949

AmeriPath
PO Box 830913
Birmingham, AL 35283-0913

American Express
Customer Service
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El Paso, TX 79998-1535

American Express Centurion Bank
c o Becket and Lee LLP
POB 3001
Malvern, PA 19355-0701

Applied Card Bank
Attention: Bankruptcy
Po Box 17125
Wilmington, DE 19850-7125

Bank of America, N.A.
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El Paso, TX 79998-2284

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Salt Lake City, UT 84130-0285

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Saint Louis, MO 63179-0110

Citibank
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Po Box 790040
Saint Louis, MO 63179-0040

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Naples, FL 34101

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Columbus, OH 43218-2789

Comenity Bank/Ann Taylor
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Comenity Bank/vctrssec
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Credit Management Lp
4200 International Pkwy
Carrollton, TX 75007-1912

Department of Revenue
PO Box 6668
Tallahassee, FL 32314-6668

Department of the Trsury
Internal Revenue Service
Philadelphia, PA 19154

Discover Bank
DB Servicing Corporation
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New Albany, OH 43054-3025

(p)DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Discover Fin Svcs Llc
Po Box 15316
Wilmington, DE 19850-5316

Express/Comenity Bank
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Po Box 182686
Columbus, OH 43218-2686

(p)CITIBANK
PO BOX 790034
ST LOUIS MO 63179-0034

Exxon Mobil
PO Box 6404
Sioux Falls, SD 57117-6404

(p)FORD MOTOR CREDIT COMPANY
P O BOX 62180
COLORADO SPRINGS CO 80962-2180

Freedom Road Financial
10509 Professional Cir S
Reno, NV 89521-5864

FreedomRoad Financial c/o Capital Recovery-9
PO Box 29426
Phoenix, AZ 85038-9426

GECRB/Care Credit
Attn: bankruptcy
Po Box 103104
Roswell, GA 30076-9104

GECRB/Gap
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076-9104

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PO Box 60167
City Of Industry, CA 91716-0167

(p)INTERNAL REVENUE SERVICE
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PHILADELPHIA PA 19101-7346

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Philadelphia, PA 19101-7346

Internal Revenue Service
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JD Receivables LLC
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Germantown, TN 38183-2656

Jeffrey Martin
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East Longmeadow, MA 01028-1487

Kay Jewelers
PO Box 3680
Akron, OH 44309-3680

Kohls
Attn: Recovery
Po Box 3120
Milwaukee, WI 53201-3120

Kohls/capone
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051-7096

Liberty Mutual
c/o Credit Collections Svcs
Two Wells Avenue
Newton Center, MA 02459-3225

Lowes
P.O. Box 981064
El Paso, TX 79998-1064

Massachusetts Dept. of Rev.
PO Box 7010
Boston, MA 02204-7010

Merrick Bk
Attn: Bankruptcy
P.O. Box 9201
Old Bethpage, NY 11804-9001

Midland Credit Mgt
8875 Aero Drive
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San Diego, CA 92123-2255

Mortgage Service Center
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Mt Laurel, NJ 08054-5452

NE Moves Mortgage, LLC
PO Box 5452
Mount Laurel, NJ 08054-5452

Navient
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Wilkes Barre, PA 18773-9500

Navient
Po Box 9655
Wilkes Barre, PA 18773-9655

Navient Solutions, Inc.
P.O. Box 9640
Wilkes-Barre, PA 18773-9640

Navient Solutions, Inc. on behalf of
Florida Department of Education
Office of Student Financial Assistance
(OSFA)
325 West Gaines Street, Suite 1314
Tallahassee, FL 32399-6533

Nelnet
PO Box 82561
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PHH Mortgage
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Mount Laurel, NJ 08054-5452

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Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Crown Asset Management LLC
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

RADIOLOGY REGIONAL CENTER
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Radiology Regional Center
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Fort Myers, FL 33901-8005

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Wilmington, DE 19804-4319

Sallie Mae
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Sallie Mae Guarantee Service
PO Box 9570
Wilkes Barre, PA 18773-9570

Southern Technical College
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Syncrony Bank
c/o Portfolio Recovery
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C O Weinstein, Pinson, And Riley, PS
2001 Western Avenue, Ste 400
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TD Bank
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Minneapolis, MN 55416-3401

Target
Po Box 9475
Minneapolis, MN 55440-9475

Td Bank Usa/targetcred
Po Box 673
Minneapolis, MN 55440-0673

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US Department of Education
PO Box 530260
Atlanta, GA 30353-0260

Us Dept Of Ed/glelsi
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Jon Waage
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Michelle Elizabeth Campion
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

American Honda Finance
1220 Old Alpharetta Road
Alpharetta, GA 30005

(d)American Honda Finance Corporation
National Bankruptcy Center
P.O. Box 168088
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866-716-6444

Bank of America
Consumer Credit
NCA-105-03-69
4161 Piedmont Parkway
Greensboro, NC 27410

(d)Bk Of Amer
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El Paso, TX 79998

Cape Coral Hospital
PO Box 150107
Cape Coral, FL 33915

Chrysler Financial
TD Auto Finance
Attn: Bankruptcy
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Jacksonville, FL 32255

Discover Card
PO Box 30943
Salt Lake City, UT 84130

Exxmbiciti
Attn.: Centralized Bcy
Po Box 20507
Kansas City, MO 64195

Ford Motor Credit
Attn: Bankruptcy
Po Box 6275
Dearborn, MI 48121

(d)Ford Motor Credit Company LLC
Dept 55953
P O Box 55000
Detroit MI 48255-0953

Internal Revenue Service
5045 E Butler Ave.
Fresno, CA 93888

Portfolio Recovery
Attn: Bankruptcy
Po Box 41067
Norfolk, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)World Omni Financial Corp.
c/o James B. Flanigan, Esquire
110 SE 6th Street, 15th Floor
Fort Lauderdale, FL 33301-5004

End of Label Matrix	
Mailable recipients	105
Bypassed recipients	1
Total	106